

In the Circuit Court of the State of Oregon

For the County of MultnomahNANCY REID,

Plaintiff(s),

VS.

Case No. 1203-03645OPTUMHEALTH CARE SOLUTIONS, INC., a
Minnesota corporation, and UNITED HEALTHGROUP
INCORPORATED, a Minnesota corporation.

SUMMONS

Defendant(s).

To CT CORPORATION SYSTEM100 South 5th Street, Suite 1075Minneapolis, MN 55402Registered Agent for United HealthGroup Incorporated

Defendant

You are hereby required to appear and defend the complaint filed against you in the above entitled action within thirty (30) days from the date of service of this summons upon you, and in case of your failure to do so, for want thereof, plaintiff(s) will apply to the court for the relief demanded in the complaint.

NOTICE TO THE DEFENDANT: READ THESE PAPERS CAREFULLY!

You must "appear" in this case or the other side will win automatically. To "appear" you must file with the court a legal document called a "motion" or "answer." The "motion" or "answer" must be given to the court clerk or administrator within 30 days along with the required filing fee. It must be in proper form and have proof of service on the plaintiff's attorney or, if the plaintiff does not have an attorney, proof of service upon the plaintiff.

If you have any questions, you should see an attorney immediately. If you need help in finding an attorney, you may contact the Oregon State Bar's Lawyer Referral Service online at www.oregonstatebar.org or by calling (503) 684-3763 (in the Portland metropolitan area) or toll-free elsewhere in Oregon at (800) 452-7636.

SIGNATURE OF ☒ ATTORNEY ☐ AUTHOR FOR PLAINTIFFRichard C. Busse, OSB #74050

ATTORNEY'S / AUTHOR'S NAME (TYPED OR PRINTED)

BAR NO. (IF ANY)

621 S.W. Morrison Street, Suite 521

ADDRESS

Portland, Oregon 97205 (503) 248-0504

CITY

STATE

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(503) 248-2131 rbusse@busseandhunt.com

FAX (IF ANY)

ATTORNEY'S E-MAIL ADDRESS (IF ANY)

TRIAL ATTORNEY IF OTHER THAN ABOVE (TYPED OR PRINTED)

BAR NO.

TO THE OFFICER OR OTHER PERSON SERVING THIS SUMMONS: You are hereby directed to serve a true copy of this summons, together with a true copy of the complaint mentioned therein, upon the individual(s) or other legal entity(ies) to whom or which this summons is directed, and to make your proof of service on the reverse hereof or upon a separate similar document which you shall attach hereto.

ATTORNEY(S) FOR PLAINTIFF(S)



IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

NANCY REID,

Plaintiff,

v.

OPTUMHEALTH CARE SOLUTIONS,
INC., a Minnesota corporation, and
UNITED HEALTHGROUP
INCORPORATED, a Minnesota
corporation,

Defendants.

Case No. **1203-03645**

COMPLAINT

(Statutory Discrimination; Age
Discrimination; Perceived Disability
Discrimination)

**CLAIMS NOT SUBJECT TO
MANDATORY ARBITRATION**

Prayer Demand: \$1,000,000

Plaintiff alleges:

FIRST CLAIM FOR RELIEF

(Statutory Discrimination)

1.

Plaintiff is a resident and citizen of the State of Oregon,

2.

Defendant OptumHealth Care Solutions, Inc. is a Minnesota corporation doing
business in Oregon, and a wholly owned subsidiary of Defendant UnitedHealth Group
Incorporated, also a Minnesota corporation doing business in Oregon, which controls it. At

1 all material times Defendants acted through agents and employees, including each other, who
2 at all material times acted within the course and scope of their agency and employment for
3 Defendants, or one of them.
4

5 3.

6 Plaintiff was employed by Defendants from on or about July 2006 until September 1,
7 2011, when she was laid off.
8

9 4.

10 Prior to her termination, and in September, 2010, Plaintiff had complained about
11 sexual harassment of another by a female manager of Defendants, and about what she
12 believed in good faith to be fraudulent activity by that same manager.
13

14 5.

15 Defendants terminated Plaintiff in substantial part in retaliation for reporting what she
16 believed in good faith to be evidence of a violation of a law, rule or regulation pertaining to
17 the conduct alleged in paragraph 4 above.
18

19 6.

20 As a result of said conduct, Plaintiff suffered and will suffer emotional distress all to
21 her non-economic damage in an amount to be proven at trial, which amount is alleged to be
22 \$500,000.
23

24 7.

25 As a further result of said conduct, Plaintiff suffered and will suffer economic damage
26 in an amount to be proven at trial, which amount is alleged to be \$500,000.

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1 8.

2 Defendants' acts were malicious and/or reckless and Plaintiff reserves the right to
3 allege punitive damages.
4

5 9.

6 Plaintiff is entitled to her costs, reasonable attorneys' and expert witness fees pursuant
7 to ORS 659A.885 and ORS 20.107.

8 **SECOND CLAIM FOR RELIEF**

9 (Age Discrimination)

10 10.

11 Plaintiff realleges paragraphs 1 through 9.
12

13 11.

14 Plaintiff was 57 years of age at the time of her termination.

15 12.

16 Defendants terminated Plaintiff in substantial part because of her age.
17

18 **THIRD CLAIM FOR RELIEF**

19 (Perceived Disability Discrimination - ORS 659A.100, *et seq.*)

20 13.

21 Plaintiff realleges paragraphs 1 through 12.
22

23 14.

24 Prior to her termination Defendants learned that Plaintiff suffered severe anxiety and
25 heart arrhythmia, for which she was hospitalized several times and required to have three in-
26 patient heart procedures and to take medical leave in April 2011. As a result, Defendants

1 perceived Plaintiff to be a disabled person.


2 15.

3 Defendants terminated Plaintiff in substantial part because she was perceived to be a
4 disabled person.
5

6 WHEREFORE, Plaintiff prays for judgment as alleged in the claims stated above.

7 DATED this 20th day of March, 2012.

8 BUSSE & HUNT

9
10 
11 _____
12 RICHARD C. BUSSE, OSB #74050
13 Telephone: (503) 248-0504
14 Facsimile: (503) 248-2131
15 *rbusse@busseandhunt.com*
16 Of Attorneys for Plaintiff Nancy Reid

17 TRIAL ATTORNEY:
18 RICHARD C. BUSSE, OSB #74050

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